WISCONSIN DEPARTMENT OF NATURAL RESOURCES
SOUTHEAST REGION

FULL COMPLIANCE EVALUATION
OF

MID-AMERICA STEEL DRUM CO./KITZINGER

FID # 241063570

[EPA Required]

INSPECTION PERFORMED BY:

Mike Griffin

DATE OF INSPECTION:

March 18, 2015

REPORT NOTED BY:

/sd/ Daniel Schramm
Daniel Schramm

DATE NOTED:

04/17/2015

DEPARTMENT OF NATURAL RESOURCES
SOUTHEAST REGION
FULL AIR COMPLIANCE EVALUATION (FCE) SUMMARY

FID: 241063570	**FCE/SITE VISIT DATE:** March 18, 2015 ☒ EPA Committed FCE ☐ Uncommitted FCE **Announced Inspection** ☒Yes ☐No
FACILITY NAME AND LOCATION: Mid-America Steel Drum Co/Kitzinger 2529 East Norwich Ave. St. Francis, WI. 53235	**EPA CLASS TYPE:** A – Major Source
COUNTY: Milwaukee County	**SIC AND NAICS CODES AND DESCRIPTIONS:** SIC: 3324 – Metal working NAICS: 332443 – Metal can, box, and other metal container manufacturing
INSPECTION PARTICIPANTS: Mark Furgason – Mid-America Steel Drum Co./Kitzinger Amy J. Litscher – President, Saga Environmental & Engineering, Inc. Mike Griffin – WDNR	**APPLICABLE AIR PROGRAMS:**

Prog./Pmt. Code:			
SIP	☒	P60 NSPS	☐
NR 445	☒	P61 NESHAP	☐
NSR	☐	P62 MACT	☐
PSD	☐	P63 NESHAP MACT Subparts MMMM & DDDDD	☒
		P63 NESHAP GACT	☐

Credentials Shown: ☒Yes ☐No

TOTAL ACTUAL FACILITY EMISSIONS IN TONS/YEAR*:

	TSP	SO_2	NO_X	VOC	CO	PM10	HAP
2013	-	-	-	29.7	-	-	11
2012	-	-	-	24.7	-	-	12
2011	-	-	-	20.7	-	-	11
Class Code	B	B	B	A	B	B	10/25
Attainment	Attn.	Attn.	Attn.	Attn.	Attn.	Attn.	Attn.
PSD Major	no	no	nos	no	no	no	no

*Emission data above is from the emission inventory.

IS FACILITY IN COMPLIANCE WITH ALL WISCONSIN AIR REGULATIONS? ☒ **Yes** ☐ **No**
Additional Information Needed for Compliance Determination? ☐ **Yes** ☒ **No**

Are permit revisions needed? ☒ **Yes** ☐ **No**

INSPECTOR SIGNATURE: */sd/ Michael Griffin* **SIGNATURE DATE:** 4/15/2015
TITLE: **Air Management Engineer**

Cc: **Bureau of Air Management - Compliance, AM/7**
Facility

FACILITY INFORMATION

FACILITY CONTACT:	FACILITY CONTACT PHONE/EMAIL:
Scott Swosinski – Air Contact, Mid-America Steel Drum Co./Kitzinger	(414) 762-1114 // sswosinski@midamericasteeldrum.com
Mark Furgason – Facility Manager, Mid-America Steel Drum Co./Kitzinger	(414) 483-8801// mfurgason@masdinc.com

FACILITY DESCRIPTION:

The facility is located in the City of St. Francis, Milwaukee County. The Company spans two sites which are located across the street from each other. There is the Norwich Avenue Site and the Pennsylvania Avenue Site. (The two locations are separated by Norwich Avenue.) The Norwich Avenue facility is in the process of shutting down as operations are being consolidated within the Pennsylvania Avenue Site. The surrounding area is commercial to the north and residential to the south. Milwaukee County is designated as attainment for all criteria air pollutants.

POINT/PROCESS DESCRIPTION:

A. Description of processes at Norwich Avenue plant (now closed and rented to a third party):

1. Process B20, Stack S08 (Process heat boiler):

Stack S08, Process B20 - Cleaver Brooks 100 HP Boiler: The boiler, installed in 1969, is natural gas-fired with a rated heat input capacity of 5.2 MMBtu/hr. The boiler was damaged, but not destroyed, by the fire in 2005. Its electrical control panel was rebuilt. The boiler continues to exhaust from a fixed exhaust stack (Stack S08). The unit's air emissions are not controlled. The amount of natural gas burned in the boiler is not metered. For inventory reporting purposes, the boiler's use of natural gas is estimated to be 10% of the facility's total usage.

2. Process P30, Stack S10, Control C10 (Reclamation furnace):

Drum Reclamation Furnace with Afterburner: The unit, installed in June of 1976, consists of a conveyor belt, combustion chamber, and afterburner. The combustion chamber and afterburner are both natural gas-fired. The combined fuel burning capacity is 16.0 MMBtu/hr. The amount of natural gas used by the furnace/afterburner is not metered. Open top metal drums are first drained of any residual solvents or oils, turned upside down and put on a conveyor that takes them to the reclamation furnace. They proceed through the reclamation furnace to remove any residual materials in the drum as well as burning the drum's interior and exterior coatings to ash. The reclamation furnace has twelve natural gas-fired burners of 1.0 MMBtu/hr each and operates at a temperature of approximately 1,600 °F. The furnace has the capacity to process 300 drums per hour. Air emissions from the furnace are vented through a 1,800 – 2,000 °F afterburner, and then go through over 30 feet of horizontal duct work before being released to the atmosphere through a vertical exhaust stack. The afterburner has four natural gas-fired burners of 1.0 MMBtu/hr each. For reporting purposes, its use of natural gas is estimated to be 70% of the facility's total usage. The exhaust stack to the furnace/afterburner was recently raised. The afterburner is estimated to control particulate matter emissions by 75% and VOC emissions by at least 85%. This process was in operation during this inspection.

3. Process P31, Stack S11, Control C11 (Two shot blasters):

Actually the facility has three shot blasting units. One unit vents inside the building and two units vent outside. Process P31 is associated with two units which vent outside the building. The shot blast units are used to remove ash and char from open top metal drums prior to spray painting. The shot blast (2 units combined) processes a maximum of 300 drums per hour. Emissions from the shot blast units are vented directly to a single baghouse (C11) which exhausts outside. The bags of the baghouse are cleaned by shaking each time a shot blast unit is shutdown for greater than one hour. At the end of each day the baghouse is cleaned and the dust collection hopper is emptied. The collected material is landfilled. After shot blasting, the steel drums are conveyed to the leak check and dent removal line. During this inspection the entire process line was rendered inoperable. Several sections of equipment have been removed from the building.

4. Process P32, Stack S12, Control C32 (Internal Drum Paint Spray Booth), Process P32A, Stack S12A, Control C32A (Internal Lid Lining Paint Spray Booth), Process P32B, Stack S12B (Curing oven associated with processes P32 and P32A), Process P32C, Stack S12C, Control 32C (Auto External Paint Spray Booth), Process P35, Stack S13, Control C35 (Manual External Spray Booth), Process P32D, Stack S55 (Curing oven associated with P32C and P35), Process P36A, Stack S14, Control C14 (New Drum Lid Spray Booth), Process P36B, Stack S56 (Curing Oven associated with P36A):

This paint line was installed in 2005 and used water based coatings. Fabric overspray filters (C32, C32A, C32C, and C14) controlled particulate matter emissions from the spray booths. From the manufacturer paint arrestor test summary, the fabric filter's particulate matter control efficiency ranged between 99.41% and 99.67% at pressure drops ranging between 0.035 and 0.5 inches of water. Process P32 consisted of 8 rotary air assist spray guns, process P32A had 3 air assist guns, process 32C had 12 air assist guns (only 11 guns were used), process P35 had 10 air assist guns and process P36A had 3 air assist guns. Painted lids and drums were oven dried in processes P32B, P32D, and P36B at 200 °F. Emissions from five paint booths and three curing ovens vented outside through individual stacks. All these processes have been removed from the facility.

5. Processes P50A, Stack S50 (Caustic Drum Pre-flush), Process P50B, Stack S51 (Caustic Wash), and Process P50C, Stack S53 (Drying oven, 0.6 MMBtu/hr):

Closed top steel drums were cleaned before painting. The process consisted of caustic pre-flush, hot caustic wash holding tank and a natural gas fired dryer. A NaOH solution was used to wash the drums. Once dry, the drums were conveyed to a manual external spray booth (P35). The drums were painted and then dried in a drying oven (P32D). The drums were then ready to ship out or go to short term storage. This process has been removed from this facility.

6. Process 60A, Stack S57 (New Drum/Lid Caustic Washer Hot Bath), Process P60B, Stack S58 (New Drum/Lid Dryer, 1 MMBtu/hr):

New manufactured drums and lids were received unpainted to supplement the need for additional drums. The drums were cleaned in a hot KOH bath(P60A), rinsed, dried (P60B) and painted (P36A). The bath had its own natural gas-fired burner (0.5 MMBtu/hr) to heat the caustic solution and the drier was natural gas-fired as well. This process has been removed from the facility.

7. Process S65, Stack S65 (Drum Lid Dip Tank):

Seal rings, which are used to attach the lids to the open top drums, were stacked on a hook and coated by dipping them into a 75 gallon paint bath. The gray colored coating was a water base paint thinned in a ratio of 3 parts paint to 4 parts water. As the coating in the bath was used up, additional coating was added to the bath using the same dilution ratio. This process has been removed from the facility.

B. Description of processes at Pennsylvania Avenue plant: (This plant is under construction as the barrel reconditioning system is being installed. The facility has been separated from the Norwich site and is identified under FID 341158070)

1. Process P44, Stack S44 (Large (55 gallon) Plastic Drum Label Stripper),
Historically, the facility used a manually brushed-on stripper that contained methylene chloride. This process is being upgraded to using high pressure water and abrasive grinding to remove labels and any remaining adhesive. This process still reports methylene chloride usage.

2. Process P80A, Stack S60 (Internal Hot Caustic Preflush)
The heater is a natural gas-fired heater rated at 1.75 MMBtu/hr. Combustion emissions are discharged through stack S60. The caustic cleaner is a 2-3% NaOH solution. The exhaust containing caustic emissions are vented uncontrolled.

3. Process P80B, Stack S61 (External Caustic Cleaning) and Process P80C, Stack S62
The heater is a natural gas-fired heater rated at 2.75 MMBtu/hr. Combustion emissions are discharged through stack S61. The caustic cleaner is a 2-3% NaOH solution. The exhaust containing caustic emissions are vented uncontrolled. P80C uses water to rinse drum exterior following caustic wash in P80B. Emissions from the external cleaning are considered insignificant.

4. Process P42, Stack S42 (Replacement Internal Drum Wash)
This process consists of a natural gas fired hot water heater rated at 1.75 MMBtu/hr. Hot water is used to rinse drum interiors and will replace the hot caustic solution.

5. Process P41, Stack S66 (Drum Drier)
The Drum Drier uses a natural gas furnace rated at 0.9 MMBtu/hr. This furnace is natural gas-fired and exhausts through stack S66.

6. P45, Stack S45 (Plastic Drum Wipe Cleaning)
This process is actually an indoor fugitive emission source. Acetone is the solvent used to wipe clean the drum exteriors.

Process P95, Stack S21, Control C21 (Small (30/5 gallon) Plastic Small Plastic Drum Caustic Pre-Flush):
Small plastic drums are dipped into a caustic sodium hydroxide solution to soften paint inside the drums. The process can handle up to 100 drums per hour. Air emissions are controlled by a wet scrubber (Process C21) which vents outside.

PERMIT(S) ISSUED:

Permit No.	Issue Date	Purpose of Permit	Expiration Date
241063570-P10	November 30, 2010	Renewal of operation permit	May 31, 2015
241063570-P11	October 24, 2012	Revision of permit number 241063570-P10	May 31, 2015
241063570-P12	December 18, 2008	Revised Operation Permit	November 30, 2015
241063570-P13	April 24, 2014	Revision request to separate the Pennsylvania and Norwich sites– Reissued under 341158070-F01/ 14-RSG-142	October 24, 2015

COMPLIANCE SUMMARY

A. – Process B20, Stack S08 — Cleaver Brooks 100-HP Boiler. [Norwich Avenue site]				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 0.04 pounds per hour from stack S08. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) For any boiler which has a maximum heat input that is greater than one million Btu per hour, the permittee may not cause, allow, or permit particulate matter emissions from the stack of such a boiler to exceed E pounds of particulate matter emissions per million Btu heat input, where E = 0.3 0.0006 I and I = total maximum heat input for a given boiler in millions of Btu per hour. [s. NR 415.06(1)(c)1., Wis. Adm. Code {Permit 08-RSG-053}]	(1) The permittee shall only fire natural gas in the boiler.[ss. 285.65(7) Stats., and NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever a stack test for particulate matter emissions is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep monthly records of the types of all fuels burned in the boiler. [s. NR 439.04(1)(d), Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – This process heater has been idled since the shutdown of this facility in November of 2013.
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.04(2),Wis. Adm. Code {Permit 08-RSG-053}] (2) Notwithstanding condition (1) above, when the boiler is being cleaned or a new fire started, emissions may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80 % opacity for 6 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day (see note). [ss. NR 431.04(2) and NR 431.05(1), Wis. Adm. Code {Permit 08-RSG-053}] Note: "Combustion equipment may not be cleaned nor a fire started more than 3 times per day" means the above exemption is available only up to 3 cleanings or fires started per day. (3) Notwithstanding condition (1) above, emissions may exceed number 1 of the Ringlemann chart or 20% opacity for stated	(1) The compliance demonstration requirement for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions.[s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a. and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance

	periods of time, as permitted by the department, for such purpose as an operating test, or other good cause, provided no hazard or unsafe conditions arises. [ss. NR 431.04(2) and NR 431.05(2), Wis. Adm. Code {Permit 08-RSG-053}]			
3. Nitrogen Oxides Emissions	(1) The boiler may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that the boiler did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.A.3.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The facility records show compliance.
4. Federal HAPs	(1) The permittee shall meet the applicable limitations in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats. {2410633570-P12}]	(1) The permittee shall comply with the applicable compliance demonstration requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {2410633570-P12}]	(1) The permittee shall meet the applicable recordkeeping and monitoring requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {2410633570-P12}]	Compliance – The initial deadline is January 31, 2016.

B. – Process P30, Control Device C10 (afterburner), Stack S10 — Reclamation Furnace. [Norwich Avenue site]				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE**	**c. REFERENCE TEST METHODS, RECORDKEEPING**	**COMPLIANCE**

		DEMONSTRATION	AND MONITORING REQUIREMENTS	STATUS
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 5.0 pounds per hour from stack S10. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be used as combustion fuel. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] (2) The afterburner shall be operated at all times the reclamation furnace is in operation. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] (3) The operating temperature of the afterburner shall be at least 1800 °F, unless the Department approves, in writing, a different minimum temperature. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	(1) Whenever a stack test for particulate matter emissions is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}] (3) The permittee shall install, operate, calibrate, and maintain the monitor(s) necessary to measure the afterburner temperature. [ss. NR 439.055(1),(4), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) The temperature monitoring device shall have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or ± 5 °F of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater. [ss. NR 439.055(3)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (5) The afterburner temperature shall be monitored and recorded at least once every 15 minutes. [ss. NR 439.055(2)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee maintains records showing natural gas was used as the fuel, the afterburner was operated when the furnace was operating and the afterburner was maintained at an operating temperature of 1800 °F. This process was shut down in November of 2013.
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions.	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance

		[s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]		
3. VOC	(1) 85% control of VOC. [s. NR 424.03(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for volatile organic compounds. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	(1) Whenever emission testing is required to demonstrate compliance, the permittee shall use Method 18 in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04, or another test method approved by the Department in writing. [ss. NR 439.06(3)(a), and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for volatile organic compounds. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance
4. NOx Emissions	(1) The process P30 may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that the process P30 did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.B.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – Facility records show operating hours were less than 80 operating hours per week.

C. Process P31, Control Device C11 (Baghouse), Stack S11 — Shot Blasting (2 emission units). {[Norwich Avenue site] }				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 1.0 pounds per hour from stack S11. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) The process P31	(1) The permittee shall use a baghouse to control particulate matter emissions from the process P31. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}] (2) The permittee shall install, operate, and maintain a device to monitor the pressure drop across the baghouse. [ss. NR 439.055(1)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall monitor and record the pressure drop across the baghouse every 8 hours of source (P31) operation, or once per day, whichever yields the greater number of	Compliance – The permittee maintains baghouse pressure drop records indicating compliance with this permit condition. This process has been

	may not operate for more than 80 hours during any week. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(3) The permittee shall perform an internal inspection of the baghouse once every calendar year to ensure that the control equipment is operating properly. The time interval between inspections may not be closer than 6 months. These inspections shall include, but not be limited to inspections and maintenance/ repair (as necessary) of: (a) valves, hatches, dampers, and gaskets for signs of air infiltration; and (b) bag condition, tension, and signs of clean side dust deposits. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	measurements. [ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep records of all inspections, checks and any maintenance (including bag replacement) or repair performed on the baghouse. The records shall include the date of the action and a description of any corrective actions taken. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) The permittee shall keep weekly records of operating hours of P31. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	removed from this facility.
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code. {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance

D. Process P32, Control Device C32 (Fabric filter), Stack S12 — Internal Drum Spray Booth. Process P32A, Control Device C32A (Fabric Filter), Stack S12A — Internal Lid Lining Spray Booth. Process P32B, Stack S12B — Curing Oven. Process P32C, Control Device C32C (Fabric Filter), Stack S12C — Auto External Drum Spray Booth. Process P35, Control Device C35 (Fabric filter), Stack S13 — Manual External Spray Booth. Process P32D, Stack S55 — Curing Oven. Process P36A, Control Device C14 (Fabric filter), Stack S14 — New Drum Lid Spray Booth. Process P36B, Stack S56 — Curing Oven. [Norwich Site]				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed the following: (a) 0.13 pounds per hour from stack S12. (b) 0.05 pounds per hour from stack S12A. (c) 0.02 pounds per hour from stack S12B.	(1)(a) For each of the spray booths, dry filter(s) shall be in place to control particulate matter emissions whenever the process is in operation (i.e. during spray operation). (b) The dry filters used in process P32C shall have a particulate	(1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee maintains baghouse pressure drop records indicating compliance with

	(d) 0.145 pounds per hour from stack S12C. (e) 0.19 pounds per hour from stack S13. (f) 0.01 pounds per hour from stack S55. (g) 0.14 pounds per hour from stack S14. (h) 0.01 pounds per hour from stack S56. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	matter control efficiency of at least 99%. (c) The dry filters used in processes P32, P32A, P35, and P36A shall have a particulate matter control efficiency of at least 98%. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) Only natural gas shall be combusted in the curing ovens (P32B, P32D, and P36B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall install, operate, and maintain a device to monitor the pressure drop across each filter. [ss. NR 439.055(1)(a), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4)(a) The pressure drop across each filter in operation shall be maintained within the range recommended by the manufacturer. (b) The permittee shall keep records (e.g. manufacturer's specifications) that indicate the manufacturer recommended pressure drop range for type of filter used in each paint booth. (c) The operating filter pressure drop range for each paint booth shall be included in the facility's malfunction prevention and abatement plan. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (5) The permittee shall perform daily inspections of the filters (on	(2) The permittee shall monitor and record the pressure drop across the filter(s) every 8 hours when the associated process is in operation. [ss. NR 439.055(2)(b)1., and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep daily records of filter inspections. The permittee shall also keep records of filter replacements including date(s) of replacement for each paint booth process. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4)(a) The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32C. (b) The permittee shall maintain records that indicate the particulate matter control efficiency of the filters used in P32, P32A, P35, and P36A. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	this permit condition. This process has been removed from this facility.

		days of operation) to ensure that the control equipment is operating properly.[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]		
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
3. Volatile Organic Compounds	(1) The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)(c), Wis. Adm. Code {Permit 08-RSG-053}] (2) Emissions may not exceed 3.5 pounds VOC per gallon of coating applied, excluding water, for extreme performance cured coatings delivered to an applicator. [s. NR 422.15(2)(b), Wis. Adm. Code {Permit 08-RSG-053}] (3) Permittee may use (facility-wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code {Permit 08-RSG-053}] * Includes any non-compliant coatings used in processes P65 and P43A (4) All VOC emissions from solvent washings shall be considered in the emissions limitations in I.D.3.a.(1),(2)	(1) The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, thinner and cleanup solvent, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (3) If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to each coating	(1) Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the density of surface coatings is required to demonstrate compliance, the permittee shall use U.S. EPA Method 24 or 24A or another test method approved by the Department in writing. [ss. NR 439.06(3)(b), and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall have available the following records on a daily basis for each coating formulation used: (a) A unique name or identification number of coating, as applied; (b) A unique name or identification and volume of clean-up solvent used, but not directed into a closed container (if any); (c) The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation). [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep the following monthly records: (a) The VOC content (in pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month;	Compliance – The facility maintains MSDS documentation showing only compliant coatings were used at this facility. This process was discontinued in November of 2013.

	unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code {Permit 08-RSG-053}]	applicator as follows: VOCa = [(VOCc x Qc) + (VOCt x Qt)]/(Qc + Qt) where: VOCa = the VOC content of the coating as delivered to the coating applicator, in pounds per gallon excluding water; VOCc = the VOC content of the coating as received, in pounds per gallon, excluding water; Qc = the amount of coating as received that mixed with thinner prior to application, in gallons, excluding water; VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water; Qt = the amount of thinner added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month; (c) Amount of VOC emitted from processes P32, P32A, P32C, P35, and P36A combined, in pounds per month. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis: (a) A unique name or identification number for each non-compliant coating applied; (b) The volume of each non-compliant coating applied during the month; (c) The aggregate volume of all non-compliant coatings applied during the month (including any non-compliant coatings used in processes P65 and P43A); and (d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P65 and P43A) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	
4. Federal HAPs	(1) The permittee shall meet all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] Note: Steel drum/Lid coating operations at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	(1) The permittee shall comply with all applicable compliance demonstration requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	(1) The permittee shall meet all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	No Evidence of Noncompliance

5. NOx	(1) Each of the curing ovens (processes P32B, P32D, and P36B) may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P32B, P32D, and P36B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.D.5.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance

E. Process P50A, Stack S50 — Caustic Drum Preflush. Process P50B, Stack S51 — Caustic Drum Wash. Table Process P50C, Stack S53 — Closed Drum Drying Oven. (Norwich site)				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Sodium Hydroxide (NaOH).	(1) The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). [s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee may not use caustic solutions that exceed 10% NaOH (by weight) in processes P50A and P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2)(a) Process P50B (drum exterior washing) may not use spray techniques. (b) Permittee shall take measures to minimize any splashing in process P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever emission testing is required to demonstrate compliance, the permittee shall use methods and plans approved, in writing, by the Department to determine NaOH emission rate or concentration. [s. NR 439.06(8), Wis. Adm. Code, s. 285.65(3), Wis. Stats.] (2) The permittee shall document and maintain a record of the percentage (or percentage range) of NaOH (by weight) in the caustic solutions used in processes P50A and P50B. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee maintains a mix ratio and records indicating the caustic solution is used at a solution mix of less than 10 % by wt. sodium hydroxide. Work practice procedures are used to minimize splashing.

2. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 0.01 pounds per hour from stack S53. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) No person may cause, allow or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard or creates air pollution. [s. NR 415.03, Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be combusted in the drying oven (P50C). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2)(a) Process P50B (drum exterior washing) may not use spray techniques. (b) Permittee shall take measures to minimize any splashing in process P50B. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]	Compliance – Only natural gas is/was used to fire the drying oven. The facility has fuel usage records for this process.
3. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department. [ss. NR 407.09(1)(c)1.a. and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
4. NOx	(1) The process P50C may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that the process P50C did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.E.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee maintains records showing this process operated less than 80 hours per week.

F. Process P60A, Stack S57 — New Drum/Lid Washer Hot Bath. Process P60B, Stack S58 — New Drum/Lid Dryer. (Norwich site)				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**

1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed the following: (a) 0.01 pounds per hour from stack S57. (b) 0.01 pounds per hour from stack S58. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be combusted in the hot water heater (in P60A) or in the dryer (P60B). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]	Compliance – Fuel use records show only natural gas was used. This process has been removed from the building.
2. Visible Emissions	1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
3. NOx	(1) The processes P60A, P60B may not operate for more than 100 hours during any week. [s. NR 404.08(2),Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P60A, P60B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.F.3.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance

G. Process P65, Stack S65 — Drum Lid Clamp Dip Tank. [located at Norwich Avenue site]				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**

1. VOC	(1) The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [s. NR 422.15(3)(c), Wis. Adm. Code {Permit 08-RSG-053}] (2) Permittee may use (facility-wide aggregate)* up to 55 gallons of non-compliant coatings during any 12 consecutive month period. [s. NR 422.03(7), Wis. Adm. Code.] * Includes any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A (3) All VOC emissions from solvent washings shall be considered in the emissions limitation in I.G.1.a.(1), unless the used wash solvent is directed into containers that prevent evaporation into the atmosphere. [s. NR 422.15(8), Wis. Adm. Code] Note: see condition	(1) The permittee shall uniquely identify and determine the VOC content of each coating applied, in units of pounds per gallon, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, and thinner, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] (3) If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to the dip tank (coating applicator) as follows: VOCa = [(VOCc x Qc) + (VOCt x Qt)]/(Qc + Qt) where: VOCa = the VOC content of the coating as delivered to the dip tank, in pounds per gallon excluding water; VOCc = the VOC content of the coating as received, in pounds per gallon, excluding water; Qc = the amount of coating as received that mixed with thinner prior to application, in gallons, excluding water;	(1) Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the density of surface coatings is required to demonstrate compliance, the permittee shall use U.S. EPA Method 24 or 24A or another test method approved by the Department in writing. [ss. NR 439.06(3)(b), and NR 407.09(4)(a)3.b., Wis. Adm. Code] (2) The permittee shall have available the following records on a daily basis for each coating formulation used: (a) A unique name or identification number of coating, as applied; (b) A unique name or identification number and volume of clean-up solvent used, but not directed into a closed container (if any); (c) The VOC content of coating, as applied in units of pounds VOC per gallon, excluding water (clean-up solvents used that are not directed into a closed container shall be included in this computation). [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep the following monthly records: (a) The VOC content (in pounds per gallon) and quantity (in gallons) of each compliant coating and noncompliant coating applied during the month; (b) The quantity (in gallons) and VOC content (in pounds per gallon) of each cleanup solvent used during the month; (c) Amount of VOC emitted, in pounds per month. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (4) If non-compliant coatings are used at the facility, the permittee shall keep the following records on a monthly basis: (a) A unique name or identification number for each non-compliant coating applied; (b) The volume of each non-compliant coating applied during the month; (c) The aggregate volume of all non-compliant coatings applied during the month (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A); and (d) The aggregate volume of all non-compliant coatings applied (including any non-compliant coatings used in processes P32, P32A, P32C, P35, P36A and P43A) during the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee maintains records showing only compliant coatings were used during this inspection period. This process has been shut down and removed from the Norwich site.

	I.ZZZ.1.a.(2), which limits VOC emissions from sources at Norwich Avenue site to 12,333 pounds per month, averaged over any 12 consecutive month period.	VOCt = the VOC content of the thinner as received, in pounds per gallon, excluding water; Qt = the amount of thinner added, in gallons, excluding water. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]		
2. Federal HAPs	(1) The permittee shall meet all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] Note: Drum lid clamp coating operations (P65) at the facility are part of the general use coating affected source that is subject to National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.	(1) The permittee shall comply with all applicable compliance demonstration requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	(1) The permittee shall meet all applicable requirements in section I.N (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) of this permit. [Subchapter V of s. NR 465, Wis. Adm. Code, s. NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	Compliance – The permittee shared records showing the coatings used were in compliance with the NESHAPs limitation of 2.6 pounds VOC HAP per gallon of coating solids.

H. Process P44, Stack S44 — Label Stripping. [Pennsylvania Avenue site]				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**

1. VOC	(1) Latest Available Control Technology (LACT) applies to this process. LACT is determined to be: (a) VOC emissions not to exceed 1,666 pounds per month averaged over any 12 consecutive month period; and (b) good operating practices. [s. NR 424.03(2)(c), Wis. Adm. Code{Permit 08-RSG-053}] (2) See condition I.ZZZ.1.a.(1)	(1) Good operating practices shall include all of the following: (a) Immediately after use, place all rags, or any other porous material used to apply solvent, in a covered container (labeled as waste solvent), and handled in accordance with local, state and federal regulations. (b) Store waste solvent only in covered containers labeled as waste solvent and handled in accordance with local, state and federal regulations. (c) Follow operating procedures which prevent solvent from dripping from the applicator during solvent application. [ss. NR 424.03(2)(c), and NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	(1) The permittee shall keep records describing the good operating practices being implemented for this process. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep the following records: (a) MSDS or equivalent document for each solvent used in this process. (b) The VOC content of each solvent used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep monthly records of: (a) the quantity of each solvent used; (b) amount of VOC emitted (in pounds); (c) amount of VOC emissions emitted (in pounds per month) averaged over the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee maintains records showing compliance with the 1,666 pounds VOC per month emission limitation. During this inspection, the process line was not in operation.
2. State HAP	(1) The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR 445.07(5)(d)2., Wis. Adm. Code. (see note below) [s. 285.65(3), Wis. Stats., ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] Note: Include records of applicable OSHA requirements, testing	(1) The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR 445.07(5)(d)2., Wis. Adm. Code. (see note below) [s. 285.65(3), Wis. Stats., ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] Note: Include records of applicable OSHA requirements, testing protocols, test results etc., to	(1) The permittee shall keep records to demonstrate that methylene chloride emissions from this process are exempt emissions under s. NR 445.07(5)(d)2., Wis. Adm. Code. (see note below) [s. 285.65(3), Wis. Stats., ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] Note: Include records of applicable OSHA requirements, testing protocols, test results etc., to demonstrate that the source is in compliance with applicable occupational safety and health administration (OSHA) requirements.	No Evidence of Noncompliance – The facility maintains usage records including testing for OSHA to show acceptable indoor concentrations. Usage of methylene chloride is decreasing and a high pressure water

	protocols, test results etc., to demonstrate that the source is in compliance with applicable occupational safety and health administration (OSHA) requirements.	demonstrate that the source is in compliance with applicable occupational safety and health administration(OSHA) requirements.		spraying/blastin g system will be used as an alternative, once construction is complete.

I Process P80A, Control C21, Stack(s) S21, S60 — Caustic Preflush with Hot Caustic Heater. Process P80B, Control C21, Stack(s) S21, S61 — Exterior Wash/Soaker with Hot Caustic Heater. Process P80C, Control 21, Stack S21 — Exterior Rinse. Process P95, Control C21, Stack S21 – Small Plastic Drum Caustic Preflush				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Particulate Matter Emissions	(1) Particulate matter emissions from stack S21 may not exceed 0.47 pounds per hour. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) Particulate matter emissions from each stack S60 and S61may not exceed 0.02 pounds per hour. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be combusted in the heaters. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2)(a) Emissions (except natural gas combustion products) from P80A and P80B shall be controlled by a wet scrubber (C21). (b) Emissions from P80C and P95 shall be controlled by a wet scrubber (C21). [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall maintain: (a) the pressure drop across the scrubber and demister within the pressure drop range (in inches of water column) recommended by the manufacturer or within a range approved by the Department; (b) the liquor flow rate through the scrubber at the flow rate (in gallons per minute) recommended by the manufacturer or at a rate approved by the Department.	(1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements: (a) the pressure drop across the scrubber and demister; (b) the liquor flow rate through the scrubber. [ss. NR 439.055(2)(b), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	Compliance – Only natural gas is used to fuel the heaters. The permittee maintains records for the wet scrubber monitoring. All pressure drop and scrubber liquor flow rate data show compliance. Internal inspections are performed annually with repairs documented.

		[ss. NR 439.055(1)(e), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] (4) The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/repair (as necessary) of: (a) the spray nozzle(s) for signs of corrosion and plugging; (b) inlet and outlet ducts for plugging and leaks; (c) the pumping system, suction pipe, and pumping system valves; and (d) the mist eliminator for signs of corrosion and plugging. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(3) The permittee shall keep records of: (a) the date, time, and initials of the person performing the required periodic inspections; (b) a list of the items inspected; and (c) any maintenance or repairs performed as a result of these inspections. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] (4) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]	
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
3. Sodium Hydroxide (NaOH)	(1) The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). [s. NR 445.07(1)(a), Wis. Adm.	(1) The compliance demonstration requirements for particulate matter emissions in conditions I.I.1.b.(2) through (4) shall also serve as a compliance demonstration method for sodium hydroxide emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) The recordkeeping and monitoring requirements for particulate matter emissions in conditions I.I.1.c.(2) through (3) will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	No Evidence of Noncompliance – The permittee dilutes the caustic solution down to 2 % when used. The scrubber does have a demister that is used to prevent carry-over of the scrubber liquor.

	Code {Permit 08-RSG-053}]			
4. NOx	(1) Each of the processes P80A, P80B may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P80A, P80B did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.I.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – Operating hours are maintained on a daily basis.
5. Federal HAPs	(1) The permittee shall meet the applicable limitations in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats. {2410633570-P12}]	(1) The permittee shall comply with the applicable compliance demonstration requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {2410633570-P12}]	(1) The permittee shall meet the applicable recordkeeping and monitoring requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {2410633570-P12}]	No Evidence of Noncompliance – The deadline for the compliance demonstration for this process is January 31, 2016.

J. Process P42A, Stack S64 — Hot Water Heater. Process P42B, Stack S63 — Hot Water Heater. [Pennsylvania Avenue site]} Process P42C, Stack S62 — Hot Water Heater. Process P41, Stack S66 — Drying Oven/Flamer.				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed: (a) 0.02 pounds per hour from S64; (b) 0.02 pounds per hour from S63; (c) 0.02 pounds per hour from S62; and (d) 0.01 pounds per hour	(1) Only natural gas shall be combusted in the heaters and in the oven. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep monthly records of type(s) of fuel used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1.,Wis. Adm. Code {08-RSG-053}]	Compliance

	from S66; [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]			
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a. and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
3. NOx	(1) Each of the processes P42A, P42B, P42C, P41 may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}]	(1) Permittee shall compile weekly records to demonstrate that each of the processes P42A, P42B, P42C, P41 did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.J.3.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance
4. Federal HAPs	(1) The permittee shall meet the applicable limitations in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats. {2410633570-P12}]	(1) The permittee shall comply with the applicable compliance demonstration requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {2410633570-P12}]	(1) The permittee shall meet the applicable recordkeeping and monitoring requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {2410633570-P12}]	No Evidence of Noncompliance

K Process P90, Control Device C21 (Wet Scrubber), Stack S21 — Tote Caustic Wash. Process P90A, Stack S67 — Hot Caustic Heater. Process P90B, Stack S68 — Hot Caustic Heater. Process P90C, Stack S69 — Hot Water Heater.				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 0.47 pounds per hour from stack S21. [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}] (2) Particulate matter emissions may not exceed: (a) 0.02 pounds per hour from S67; (b) 0.02 pounds per hour from S68; and (c) 0.02 pounds per hour from S69 [s. NR 404.08(2), Wis. Adm. Code {Permit 08-RSG-053}]	(1) Only natural gas shall be combusted in the heaters. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) Emissions from P90 shall be controlled by a wet scrubber (C21). [s. 285.65(7), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall maintain: (a) the pressure drop across the scrubber and demister within the pressure drop range (in inches of water column) recommended by the manufacturer or within a range approved by the Department; (b) the liquor flow rate through the scrubber at the flow rate (in gallons per minute) recommended by the manufacturer or at a rate approved by the Department. [ss. NR 439.055(1)(e), and NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] (4) The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/repair (as necessary) of: (a) the spray nozzle(s) for signs of corrosion and plugging; (b) inlet and outlet ducts for plugging and leaks; (c) the pumping system, suction pipe, and pumping system valves; and (d) the mist eliminator for signs of corrosion and plugging.	1) Whenever particulate matter emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 5, or 17 including condensable backhalf emissions (U.S. EPA Method 202) or another test method approved by the Department in writing. [ss. NR 439.06(1), NR 439.07(8)(b)7., and NR 407.09(1)(c)1.a., Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements: (a) the pressure drop across the scrubber and demister; (b) the liquor flow rate through the scrubber. [ss. NR 439.055(2)(b), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] (3) The permittee shall keep records of: (a) the date, time, and initials of the person performing the required periodic inspections; (b) a list of the items inspected; and (c) any maintenance or repairs performed as a result of these inspections. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	Compliance (Refer to P80 (page 22) above for scrubber details.)

		[s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]		
2. Visible Emissions	(1) Number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code {Permit 08-RSG-053}]	1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	1) Whenever visible emission testing is required to demonstrate compliance, the permittee shall use U.S. EPA Method 9 or another test method approved by the Department in writing. [ss. NR 407.09(1)(c)1.a., and NR 439.06(9)(a)1., Wis. Adm. Code {Permit 08-RSG-053}] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for visible emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
3. Sodium Hydroxide (NaOH)	(1) The permittee may not cause, allow or permit emissions in such quantity or concentration or for such duration as to cause an ambient concentration of sodium hydroxide off the source property that exceeds 200 micrograms per cubic meter (per 1 hour). [s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]	(1) The compliance demonstration requirements for particulate matter emissions shall also serve as a compliance demonstration method for sodium hydroxide emissions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Whenever emission testing is required to demonstrate compliance, the permittee shall use methods and plans approved, in writing, by the Department to determine NaOH emission rate or concentration. [s. NR 439.06(8), Wis. Adm. Code, s. 285.65(3), Wis. Stats.] (2) The recordkeeping and monitoring requirements for particulate matter emissions will also serve to demonstrate compliance for sodium hydroxide emissions. [s. NR 407.09(4)(a), Wis. Adm. Code]	Compliance
4. NOx	(1) Each of the processes P90A, P90B, P90C may not operate for more than 100 hours during any week. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] (2) Exhaust stacks S67, S68 and S69 shall have unobstructed air flows. [s. NR 404.08(2), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}	(1) Permittee shall compile weekly records to demonstrate that each of the processes P90A, P90B, P90C did not operate for more than 100 hours per week. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}] (2) Permittee shall ensure the exhaust stacks for the heaters (stacks S67, S68 and S69) are not equipped with rainhats or other devices that impedes the upward flow of exhaust gases. [s. 285.65(3), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {Permit 08-RSG-053}]	(1) Permittee shall keep records required in condition I.L.4.b.(1). [ss. NR 439.04(1)(d), and NR 407.09(4)(a)1., Wis. Adm. Code {Permit 08-RSG-053}]	Compliance
5. Federal HAPs	(1) The permittee shall meet the applicable	(1) The permittee shall comply with the applicable compliance demonstration	1) The permittee shall meet the applicable recordkeeping and monitoring requirements in section	No Evidence of Noncompliance

	limitations in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats. {2410633570-P12}]	requirements in section I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a)3.b., Wis. Adm. Code {2410633570-P12}]	I.O. (National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters for Major Source) of this permit. [40 CFR part 63, subpart DDDDD, ss. 285.65(3) and (13), Wis. Stats., s. NR 407.09(4)(a), Wis. Adm. Code {2410633570-P12}]	

L. Process P45, Stack S45 — Plastic Drum Cleaning. [Pennsylvania Avenue site]				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. VOC	(1) Latest Available Control Technology (LACT) applies to this process. LACT is determined to be: (a) VOC emissions not to exceed 1,666 pounds per month averaged over any 12 consecutive month period; and (b) good operating practices. [s. NR 424.03(2)(c), Wis. Adm. Code{Permit 08-RSG-053}] (2) See condition I.ZZZ.1.a.(1)	1) Good operating practices shall include all of the following: (a) Immediately after use, place all rags, or any other porous material used to apply VOC containing solvent, in a covered container (labeled as waste solvent), and handled in accordance with local, state and federal regulations. (b) Store waste VOC-containing solvent only in covered containers labeled as waste solvent and handled in accordance with local, state and federal regulations. (c) Follow operating procedures which prevent VOC-containing solvent from dripping from the applicator during solvent application. [ss. NR 424.03(2)(c), and NR 407.09(4)(a)3.b., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	(1) The permittee shall keep records describing the good operating practices being implemented for this process. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep the following records: (a) MSDS or equivalent document for each solvent used in this process. (b) The VOC content of each solvent used. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}] (3) The permittee shall keep monthly records of: (a) the quantity of each solvent used; (b) amount of VOC emitted (in pounds); (c) amount of VOC emissions emitted (in pounds per month) averaged over the last 12 consecutive month period. [ss. NR 439.04(1)(d), and NR 407.09(4)(a), Wis. Adm. Code {Permit 08-RSG-053}]	Compliance – The permittee' s records show monthly VOC emissions are well below 1,666 pounds of VOC per month.

M. National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products [Chapter NR 465, Subchapter V, Wisconsin Administrative Code, and 40 CFR 63, Subpart MMMM]	
1. Condition Type: Emission Limits	**COMPLIANCE STATUS**
a. Conditions: **(1)** For the general use coating affected source, limit organic HAP emissions to no more than 0.31 kg of organic HAP per liter (2.6 lb/gallon) of coating solids used during each 12−month compliance period. **[s. NR 465.43(1)(b)1., Wis. Adm. Code {Permit 08-RSG-053}]** Notes: *(1)*The facility's miscellaneous metal parts and products coating operations falls under only the general use coating sub-category of the NESHAP. Therefore, emission limits applicable for other coating sub-categories (viz. high performance coating, magnet wire coating, rubber-to-metal coatings, and extreme performance fluoropolymer coatings) are not included in this permit. NESHAP requirements included in this permit pertain to general use coating sub-category only. If facility operations fall under one or more of the other coating sub-categories, permittee shall comply with all applicable emission limits and requirements in subchapter V of s. NR 465, Wis. Adm. Code. *(2)* The affected source is the collection of all of the items listed in (a) to (d) below that are used for surface coating of miscellaneous metal parts and products within each* sub-category: (a) All coating operations. (b) All storage containers and mixing vessels in which coatings, thinners and other additives, and cleaning materials are stored or mixed. (c) All manual and automated equipment and containers used for conveying coatings, thinners and other additives, and cleaning materials. (d) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation. *Since all coating operations at the facility are under the general use coating sub-category, there is only one affected source at the facility consisting of applicable items in *(2)*(a)-(d), above.	Compliance – The permittee' s records show they are using compliant coatings with respect to the NESHAP.
2. Condition Type: Compliance Options	
a. Conditions: **(1)** You shall include all coatings, thinners and other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition I.N.1.a.(1). To make this determination, you shall use at least one of the compliance options listed in Conditions I.N.2.a.(2) and (3). You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch	Compliance

between compliance options for any coating operation or group of coating operations, you shall document this switch as required by Condition I.N.5.a.(1)(c), and you shall report it in the next semiannual compliance report required in Condition I.N.4. **[s. NR 465.43(2), Wis. Adm. Code; 40 CFR 63.3891]** **(2)** *Compliant material option.* You shall meet all the requirements of s. NR 465.46 to demonstrate compliance with the emission limit in Condition I.N.1.a.(1) using this option. To use this option, you shall demonstrate that the organic HAP content of each coating used in the coating operation or operations is less than or equal to the emission limit in Condition I.N.1.a.(1), and that each thinner and other additive, and cleaning material used contains no organic HAP. **[s. NR 465.43(2)(a), Wis. Adm. Code {Permit 08-RSG-053}]** **(3)** *Emission rate without add-on controls option.* You shall meet all the requirements of s. NR 465.47 to demonstrate compliance with the emission limit in Condition I.N.1.a.(1) using this option. To use this option, you shall demonstrate that, based on the coatings, thinners and other additives, and cleaning materials used in the coating operation or operations, the organic HAP emission rate for the coating operation or operations is less than or equal to the emission limit in Condition I.N.1.a.(1), calculated as a rolling 12−month emission rate and determined on a monthly basis. **[s. NR 465.43(2)(b), Wis. Adm. Code; 40 CFR 63.3891(b)]** Note: Add-on controls option is not included in this permit as the facility does not use add-on control equipment to demonstrate compliance. Requirements for add-on control option can be found in s. NR 465.48, Wis. Adm. Code.	
3. Condition Type: General Compliance Requirements	
a. Conditions: **(1)** Any coating operation for which you use the compliant material option or the emission rate without add-on controls option shall be, as specified in s. NR 465.43 (2) (a) and (b), in compliance with the emission limit in Condition I.N.1.a.(1) at all times. **[s. NR 465.44(1)(a)1., Wis. Adm. Code; 40 CFR 63.3900(a)(1)]** **(2)** You shall always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this section, according to the provisions in s. NR 460.05 (4) (a)1, Wis. Adm. Code. **[s. NR 465.44(1)(b), Wis. Adm. Code; 40 CFR 63.3900(b)]** **(3)** You shall comply with the applicable general provisions requirements in ch. NR 460, Wis. Adm. Code. Appendix MMMM in ch. NR 460 shows which parts of the general provisions in ch. NR 460 apply to you. **[s. NR 465.44(2), Wis. Adm. Code]**	Compliance
4. Condition Type: Reports	
a. Conditions: **(1)** *Semiannual compliance reports.* You shall submit semiannual compliance reports for the affected source according to the requirements of (a) to (f). **(a)** *'Dates.'* You shall submit the first and subsequent compliance reports on the dates specified in Condition I.ZZZ.5.b.(1)(a). **(b)** *'Inclusion with Title V report.'* You shall report all deviations in the semiannual monitoring report required by Condition I.ZZZ.5.a.(1). If you submit a semiannual compliance report pursuant to this Condition along with, or as part of, the semiannual monitoring report required by Condition I.ZZZ.5.a.(1), and the semiannual compliance report includes all required information concerning deviations from the emission limit in Condition I.N.1.a.(1), its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring	Compliance – No deviations were reported during this inspection period.

report. However, submission of a semiannual compliance report does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Department.

(c) *`General requirements.'* The semiannual compliance report shall contain the information specified in (i) to (vii), and the information specified in (d) to (f) that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. The information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in Condition I.N.2. that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you shall report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls option in Condition I.N.2.a.(3), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(vi) If you used the predominant activity alternative in Condition I.N.2.a.(4), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.

(vii) If you used the facility-specific emission limit alternative in Condition I.N.2.a.(4), include the calculation of the facility− specific emission limit for each 12−month compliance period during the 6−month reporting period.

(d) *`No deviations.'* If there were no deviations from the emission limit in Condition I.N.1.a.(1), the semiannual compliance report shall include a statement that there were no deviations from the emission limits during the reporting period.

(e) *`Deviations: compliant material option.'* If you used the compliant material option in Condition I.N.2.a.(2), and there was a deviation from the applicable organic HAP content requirement in Condition I.N.1.a.(1), the semiannual compliance report shall contain the information in (i) to (iv). (i) Identification of each coating used that deviated from the emission limit in Condition I.N.1.a.(1), and each thinner and other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content, using Equation 2 of Condition I.N.6.2.(c), for each coating identified in (i). You do not need to submit background data supporting this calculation, such as information provided by coating suppliers or manufacturers, or test reports.

(iii) The determination of mass fraction of organic HAP for each thinner and other additive, and cleaning material identified in (i). You do not need to submit background data supporting this calculation, such as information provided by material suppliers or manufacturers, or test reports.

(iv) A statement of the cause of each deviation.

(f) *`Deviations: emission rate without add-on controls option.* If you used the emission rate without add-on controls option in Condition I.N.2.a.(3) and there was a deviation from the emission limit in Condition I.N.1.a.(1), the semiannual compliance report shall contain the information in (i) to (iii).

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission

limit in Condition I.N.1.a.(1) (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You shall submit the calculations for Equations 1, 1A to 1C, 2, and 3 of Condition I.N.7.a.(2); and if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition I.N.7.a.(2)(e)(ii). You do not need to submit background data supporting these calculations, such as information provided by materials suppliers or manufacturers, or test reports. (iii) A statement of the cause of each deviation. **[s. NR 465.45(2), Wis. Adm. Code; 40 CFR 63.3920]**	
5. Condition Type: Records	
a. Conditions: **(1)** You shall collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. **(a)** A copy of each notification and report that you submitted to comply with this subchapter, and the documentation supporting each notification and report. **(b)** A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, you shall keep a copy of the complete test report. If you used information provided to you by the manufacturer or supplier of the material that was based on testing, you shall keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. **(c)** For each compliance period, the records specified in (i) to (iii): (i) A record of the coating operations on which you used each compliance option and the time periods, beginning and ending dates and times, for each option you used. (ii) For the compliant material option in Condition I.N.2.a.(2), a record of the calculation of the organic HAP content for each coating, using Equation 2 of Condition I.N.6.a.(2). (iii) For the emission rate without add-on controls option in Condition I.N.2.a.(3), a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and other additives, and cleaning materials used each month using Equations 1 and 1A to 1C and 2 of Condition I.N.7.a.(2) and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition I.N.7.a.(2) (e)(ii); the calculation of the total volume of coating solids used each month using Equation 2 of Condition I.N.7.a.(2); and the calculation of each 12-month organic HAP emission rate using Equation 3 of Condition I.N.7.a.(2). **(d)** A record of the name and volume of each coating, thinner and other additive, and cleaning material used during each compliance period. If you are using the compliant material option in Condition I.N.2.a.(2) for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used. **(e)** A record of the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(f)** A record of the volume fraction of coating solids for each coating used during each compliance period.	Compliance - The permittee maintains documentation from each coating vendor showing the pounds VOC HAP per gallon of coating solids. All values show compliance. Usage records and types of coatings applied are documented on a daily basis. None of the coatings are thinned.

(g) If you use the emission rate without add-on controls option in Condition I.N.2.a.(3), the density for each coating, thinner, other additive and cleaning material used during each compliance period. **(h)** If you use an allowance in Equation 1 of Condition I.N.7.a.(2) for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF)according to Condition I.N.7.a.(2) (e)(ii), you shall keep records of the information specified in (i) to (iii). (i) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of Condition I.N.7.a.(2); a statement of which subparts under 40 CFR parts 262, 264, 265 and 266 apply to the facility; and the date of each shipment. (ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of Condition I.N.7.a.(2). (iii) The methodology used in accordance with Condition I.N.7.a.(2)(e)(ii) to determine the total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. You shall include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring and supporting calculations and documentation, including the waste manifest for each shipment. **(i)** You shall keep records of the date, time and duration of each deviation. **[s. 465.45(3), Wis. Adm. Code; 40 CFR 63.3930]** **(2)** Your records shall be in a form suitable and readily available for expeditious review, according to s. NR 460.09 (2) (a). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. **(a)** You shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. **(b)** You shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record. You may keep the records off-site for the remaining 3 years. **[s. NR 465.45(4), Wis. Adm. Code; 40 CFR 63.3931]**	
6. Condition Type: Compliance Requirements for the Compliant Material Option	
a. Conditions: **(1)** You shall complete the initial compliance demonstration for the initial compliance period according to the requirements in (2) *[i.e. condition I.N.6.a.(2) below]*. The initial compliance period begins on January 2, 2007 and ends on the last day of the 12th month following the compliance date. The initial compliance period extends through January, 2007 plus the next 12 months. The initial compliance demonstration includes the calculations according to (2) and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the emission limit in Condition I.N.1.a.(1), and that you used no thinners or other additives, or cleaning materials that contained organic HAP as determined according to (2)(a). **[s. NR 465.46(1), Wis. Adm. Code; 40 CFR 63.3940]** **(2)** You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source or for all the coating operations in the affected source. You shall use either the emission rate without add-on controls option in Condition I.N.2.a.(3) for any coating operation in the affected source for which you do not use the compliant material option. To demonstrate initial compliance using the	Compliance – The permittee uses the compliant material option.

compliant material option, the coating operation or group of coating operations may not use any coating with an organic HAP content that exceeds the emission limit in Condition I.N.1.a.(1) and shall use no thinner or other additive, or cleaning material that contains organic HAP as determined according to (a) to (d). Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in s. NR 465.43 (3) and (4). You shall meet all the requirements of this section. You shall use the procedures in (a) to (d) on each coating, thinner, other additive and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to re-determine the organic HAP content of coatings, thinners, other additives and cleaning materials that are reclaimed on-site, or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site, and reused in the coating operation or operations for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) *Determine the mass fraction of organic HAP for each material used.* You shall determine the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during the compliance period by using one of the following 5 options:

(i) *`Method 311.'* You may use Method 311 in 40 CFR part 63, Appendix A, for determining the mass fraction of organic HAP. You shall use the procedures specified in (A) and (B) when performing a Method 311 test.

(A) Count each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. Express the mass fraction of each organic HAP you count as a value truncated to 4 places after the decimal point.

(B) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to 3 places after the decimal point.

(ii) *`Method 24.'* For coatings, you may use Method 24 in 40 CFR part 60, Appendix A, to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in 40 CFR part 63, Subpart PPPP Appendix A, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in 40 CFR part 63, Subpart PPPP, Appendix A as a substitute for the mass fraction of organic HAP.

(iii) *`Alternative method.'* You may use an alternative test method for determining the mass fraction of organic HAP once the administrator has approved it. You shall follow the procedure in s. NR 460.06 (5) to submit an alternative test method for approval.

(iv) *`Information from the supplier or manufacturer of the material.'* You may rely on information other than that generated by the test methods specified in (i) to (iii), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction content. If there is a disagreement between the manufacturer's data and results of a test conducted according to (i) to (iii), then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct.

(v) *`Solvent blends.'* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 2 or 3 of ch. NR 465, Subchapter V, Wis. Adm. Code. If you use the tables, you shall use the values in Table 2 for all solvent blends that match Table 2 entries according to the instructions for Table 2, and you may use Table 3 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 2 and you know only whether the blend is aliphatic or aromatic. However, if the results of a test using Method 311 in 40 CFR part 63, Appendix A, indicate higher values than those listed on Table 2 or 3,

the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct.

(b) *Determine the volume fraction of coating solids for each coating.* You shall determine the volume fraction of coating solids, in liters (gallons) of coating solids per liter (gallon) of coating, for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in (i) to (iv). If test results obtained according to (i) do not agree with the information obtained under (iii) or (iv), the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct.

(i) *ASTM D2697−86 (1998) or ASTM D6093−97 (2003).* You may use ASTM D2697−86 (1998) "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings", or ASTM D6093−97 (2003) "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer", to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(ii) *Alternative method'* You may use an alternative test method for determining the solids content of each coating once the administrator has approved it. You shall follow the procedure in s. NR 460.06(5) to submit an alternative test method for approval.

(iii) *Information from the supplier or manufacturer of the material'* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(iv) *Calculation of volume fraction of coating solids'* You may determine the volume fraction of coating solids using the following equation:

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}} \quad \text{(Equation 1)}$$

where:

V_s is the volume fraction of coating solids, liters (gallons) of coating solids per liter (gallon) of coating.

$m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds, water and exempt compounds, determined according to Method 24 in 40 CFR part 60, Appendix A, grams (lb) of volatile matter per liter (gallon) of coating.

D_{avg} is the average density of volatile matter in the coating, grams (lb) of volatile matter per liter (gallon) of volatile matter, determined from test results using ASTM D1475−98 (2003) "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475−98 (2003) test results and other information sources, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct.

(c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM D1475−98 (2003) "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM D1475−98 (2003) test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct.

(d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content of each coating used during the compliance period using the following equation:

$$H_c = \frac{(D_c)(W_c)}{V_s}$$ (Equation 2)

where:

H_c is the organic HAP content of the coating, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used.

D_c is the density of coating, kg (lb) of coating per liter (gallon) of coating, determined according to (c).

W_c is the mass fraction of organic HAP in the coating, kg (lb) of organic HAP per kg (lb) of coating, determined according to (a).

V_s is the volume fraction of coating solids, liter (gallon) of coating solids per liter (gallon) of coating, determined according to (b).

(e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period shall be less than or equal to the emission limit in Condition I.N.1.a.(1); and each thinner and other additive, and cleaning material used during the initial compliance period shall contain no organic HAP, determined according to (a). You shall keep all records required by Condition I.N.5.

[s. NR 465.46(2), Wis. Adm. Code; 40 CFR 63.3941]

(3)(a) For each compliance period, to demonstrate continuous compliance, you shall use no coating for which the organic HAP content, determined using Equation 2 of (2)(d), exceeds the emission limit in Condition I.N.1.a.(1), and use no thinner or other additive, or cleaning material that contains organic HAP, determined according to (2)(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in (1), is the end of a compliance period consisting of that month and the preceding 11 months.

(b) If you choose to comply with the emission limit in Condition I.N.1.a.(1) by using the compliant material option, the use of any coating, thinner or other additive, or cleaning material that does not meet the criteria specified in (a) is a deviation from the emission limits in Condition I.N.1.a.(1) that shall be reported as specified in Condition I.N.4.a.(1)(e).

(c) As part of each semiannual compliance report required by Condition I.N.4.a.(1), you shall identify the coating operations for which you used the compliant material option. If there were no deviations from the emission limit in Condition I.N.1.a.(1), submit a statement that the coating operations were in compliance with the emission limits during the reporting period because you used no coatings for which the organic HAP content exceeded the emission limit in Condition I.N.1.a.(1), and you used no thinner, other additive or cleaning material that contained organic HAP, determined according to (2)(a).

(d) You shall maintain records as specified in Condition I.N.5.

[s. NR 465.46(3), Wis. Adm. Code; 40 CFR 63.3942]

7. Condition Type: Compliance Requirements for the Emission Rate Without Add-on Control Option

a. Conditions:

(1) You shall complete the initial compliance demonstration for the initial compliance period according to the requirements of (2) *[i.e. condition I.N.7.a.(2)]*. The initial compliance period begins on January 2, 2007 and ends on the last day of the 12th month following the compliance date. The initial compliance period extends through the end of that month plus the next 12 months. You shall determine the mass of organic HAP emissions

Compliance

and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to (2) and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the emission limit in Condition I.N.1.a.(1). **[s. NR 465.47(1), Wis. Adm. Code; 40 CFR 63.3950]**

(2) You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You shall use the compliant material option in Condition I.N.2.a.(2) for any coating operation in the affected source for which you do not use the emission rate without add-on controls option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations shall meet the emission limit in Condition I.N.1.a.(1), but is not required to meet the operating limits or work practice standards in s. NR 465.43 (3) and (4). You shall meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners or other additives, or cleaning materials used on coating operations for which you use the compliant material option in Condition I.N.2.a.(2). You do not need to redetermine the mass of organic HAP in coatings, thinners or other additives, or cleaning materials that have been reclaimed on-site, or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site, and reused in the coating operation or operations for which you use the emission rate without add-on controls option. If you use coatings, thinners or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used during each month according to the requirements in Condition I.N.6.a.(2)(a).

(b) *Determine the volume fraction of coating solids.* Determine the volume fraction of coating solids, in liters (gallons) of coating solids per liter (gallon) of coating, for each coating used during each month according to the requirements in Condition I.N.6.a.(2)(b).

(c) *Determine the density of each material.* Determine the density of each liquid coating, thinner or other additive, and cleaning material used during each month from test results using ASTM D1475-98 (2003), "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products", information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM D5965-02 "Standard Test Methods for Specific Gravity of Coating Powders", or information from the supplier. If there is disagreement between ASTM Method D1475-98 (2003) or ASTM Method D5965-02 test results and other information sources, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the department that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C and 2 of this section.

(d) *Determine the volume of each material used.* Determine the volume, in liters or gallons, of each coating, thinner and other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C of this section.

(e) *Calculate the mass of organic HAP emissions.*

(i) The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using the following equations and the procedures in (ii) if applicable:

Calculate the mass of organic HAP emissions using Equation 1:

$$H_e = A + B + C - R_w \quad \text{(Equation 1)}$$

where:

H_e is the total mass of organic HAP emissions during the month, kg (lb).

A is the total mass of organic HAP in the coatings used during the month, kg (lb), as calculated in Equation 1A of this section.

B is the total mass of organic HAP in the thinners and other additives used during the month, kg (lb), as calculated in Equation 1B of this section

C is the total mass of organic HAP in the cleaning materials used during the month, kg (lb), as calculated in Equation 1C of this section.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg (lb), determined according to (ii). You may assign a value of zero to Rw if you do not wish to use this allowance. Calculate the kg (lb) organic HAP in the coatings used during the month using Equation 1A:

$$A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad \text{(Equation 1A)}$$

where:

A is the total mass of organic HAP in the coatings used during the month, in kg (lb).

$Vol_{c,i}$ is the total volume of coating, i, used during the month, in liters (gallons).

$D_{c,i}$ is the density of coating, i, kg (lb) of coating per liter (gallon) of coating.

$W_{c,i}$ is the mass fraction of organic HAP in coating, i, kg (lb) of organic HAP per kg (lb) of coating. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in 40 CFR part 63, Subpart PPPP, Appendix A.

m is the number of different coatings used during the month.

Calculate the kg (lb) of organic HAP in the thinners and/or other additives used during the month using Equation 1B:

$$B = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad \text{(Equation 1B)}$$

where:

B is the total mass of organic HAP in the thinners and other additives used during the month, in kg (lb).

$Vol_{t,j}$ is the total volume of thinner or other additive, j, used during the month, in liters (gallons).

$D_{t,j}$ is the density of thinner or other additive, j, kg per liter (lb per gallon).

$W_{t,j}$ is the mass fraction of organic HAP in thinner or other additive, j, kg (lb) of organic HAP per kg (lb) of thinner or other additive. For

reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in 40 CFR part 63, Subpart PPPP, Appendix A.

n = is the number of different thinners and other additives used during the month.

Calculate the kg (lb) organic HAP in the cleaning materials used during the month using Equation 1C:

$$C = \sum_{k=1}^{p} (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad \text{(Equation 1C)}$$

where:

C is the total mass of organic HAP in the cleaning materials used during the month, in kg (lb).

$Vol_{s,k}$ is the total volume of cleaning material, k, used during the month, in liters (gallons).

$D_{s,k}$ is the density of cleaning material, k, kg per liter (lb per gallon).

Ws,k is the mass fraction of organic HAP in cleaning material, k, kg (lb) of organic HAP per kg (lb) of material

p is the number of different cleaning materials used during the month.

(ii) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you shall determine the mass according to (A) to (D):

(A) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265 or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(B) You shall determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(C) Determine the total mass of organic HAP contained in the waste materials specified in (B).

(D) You shall document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in Condition I.N.5.a.(1)(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used, liters (gallons), which is the combined volume of coating solids for all the coatings used during each month, using the following equation:

$$V_{st} = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i}) \quad \text{(Equation 2)}$$

where:

V_{st} is the total volume of coating solids used during the month, liters (gallons).

$Vol_{c,i}$ is the total volume of coating i, used during the month, liters (gallons).

$V_{s,i}$ is the volume fraction of coating solids for coating i, liters (gallons) of solids per liter (gallon) of coating, determined according to Condition I.N.6.a.(2)(b)

m is the number of coatings used during the month. **(g)** *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period using the following equation:

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}} \qquad \text{(Equation 3)}$$

where:

H_{yr} is the average organic HAP emission rate for the compliance period, kg (lb) of organic HAP emitted per liter (gallon) of coating solids used.

H_e is the total mass of organic HAP emissions from all materials used during month y, kg (lb), as calculated by Equation 1 of this section.

V_{st} is the total volume of coating solids used during month y, liters (gallons), as calculated by Equation 2 of this section.

y is the number of the month in the compliance period.

n is the number of full or partial months in the compliance period. For the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13. For all following compliance periods, n equals 12.

(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section shall be less than or equal to the emission limit in Condition I.N.1.a.(1). You shall keep all records as required by Condition I.N.5.

[s. NR 465.47(2), Wis. Adm. Code; 40 CFR 63.3951]

(3)(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to (2)(a) to (g) *[i.e. conditions I.N.7.a.(2)(a) through (g)]*, shall be less than or equal to the emission limit in Condition I.N.1.a.(1). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in (1) is the end of a compliance period consisting of that month and the preceding 11 months. You shall perform the calculations in (2)(a) to (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under Condition I.N.2.a.(4), you shall also perform the calculation using Equation 1 in s. NR 465.43 (1) (c) 2. on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the emission limit in Condition I.N.1.a.(1), this is a deviation from the emission limit for that compliance period and shall be reported as specified in Condition I.N.4.a.(1)(f).

(c) As part of each semiannual compliance report required by Condition I.N.4., you shall identify the coating operations for which you used the emission rate without add-on controls option. If there were no deviations from the emission limit in Condition I.N.1.a.(1), you shall submit a statement that the coating operations were in compliance with the emission limits during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the emission limit in Condition I.N.1.a.(1), determined according to (2)(a) to (g).

(d) You shall maintain records as specified in Condition I.N.5.

[s. NR 465.47(3), Wis. Adm. Code; 40 CFR 63.3952]

O. National Emission Standards for Hazardous Air Pollutants (NESHAP): Industrial, Commercial, and institutional Boilers and Process Heaters for Major Sources (40 CFR part 63, subpart DDDDD – Boiler MACT).				
POLLUTANT	**a. LIMITATIONS**	**b. COMPLIANCE DEMONSTRATION**	**c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
1. Federal HAPs	(1) No later than January 31, 2016, the permittee shall have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in Table 3 of 40 CFR 63, subpart DDDDD, satisfies the energy assessment. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. [40 CFR §§ 63.7495(b), 63.7500(a)(1), 63.7510(e), and Table 3 of subpart DDDDD, and s. 285.65(13),	(1) The energy assessment shall include: (a) A visual inspection of the boiler or process heater system; (b) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints; (c) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator; (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; (e) A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified; (f) A list of cost-effective energy conservation measures that are within the facility's control; (g) A list of the energy savings potential of the energy conservation measures identified; and (h) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [Table 3 of subpart DDDDD, 40 CFR 63, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	(1) The permittee shall maintain copies of each notification and report submitted to comply with 40 CFR 63, subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or annual, 2-, or 5-year compliance report submitted, according to the requirements in § 63.10(b)(2)(xiv). [40 CFR § 63.7555(a) and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (2) Before the close of business on the 60th day following the completion of all initial compliance demonstrations (facility energy assessment and boiler tune-ups) for all boiler or process heaters at the facility, not to exceed March 31, 2016, the permittee shall submit a Notification of Compliance Status according to §§ 63.9(h)(2)(ii) and 63.10(d)(2). The notification shall contain the following information: (a) A description of the affected unit(s) including identification of which subcategory the unit is in, the design heat input capacity of the unit, description of the fuel(s) burned, and justification for the selection of fuel(s) burned during the compliance demonstration. (b) A signed certification that the permittee have met all applicable work	Compliance – The permittee is planning to have an energy assessment done on each applicable unit. At this time, none of the affected units have been assessed. The due date is January 31, 2016.

	Wis. Stats. (MACT, 241063570-P12)] (2) No later than January 31, 2016, and every 5 years thereafter, not to exceed 61 months after the previous tune-up, the permittee shall conduct a tune-up of each boiler and process heater designed to burn a gas 1 fuel with a continuous oxygen trim system that maintains an optimum air to fuel ratio or a heat input capacity of less than or equal to 5 million Btu per hour. [40 CFR §§ 63.7495(b), 63.7500(a)(1) and (e), 63.7510(e), 63.7515(d), and Table 3 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (3) No later than January 31, 2016, and biennially (every 2 years) thereafter, not to exceed 25 months after the previous tune-up, the permittee shall conduct a tune-up of each boiler and process heater designed to burn a gas 1 fuel2 (which	(2) Each boiler tune-up shall be conducted as follows: (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection; (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject; (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and (f) Maintain on-site and submit, if requested by the U.S. EPA, an annual report containing the information below (Paragraphs (a)(10)(vi)(A) through (C) of 40 CFR § 63.7540). (i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load,	practice standards. (c) If there is a deviation from any work practice standard, the permittee shall also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report. (d) In addition to the information required in § 63.9(h)(2), the Notification of Compliance Status must include the following certification(s) of compliance, as applicable, and signed by a responsible official: (i) "This facility complies with the required initial tune-up according to the procedures in § 63.7540(a)(10) (i) through (vi)." (ii) "This facility has had an energy assessment performed according to § 63.7530(e)." (iii) Except for units that burn only natural gas or other gas 1 fuel, include the following: "No secondary materials that are solid waste were combusted in any affected unit." [40 CFR §§ 63.7530(d) through (f), and 63.7545(e) and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)] (3) After submittal of the Notification of Compliance Status, the permittee shall submit annual, biennial and/or 5-year compliance reports. For units that are subject only to a requirement to conduct an annual, biennial or 5-year tune-up according to § 63.7540(a)(10), (11) or (12), respectively, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (5) of § 63.7550, instead of a semi-annual compliance report. The first compliance	

	includes natural gas) without a continuous oxygen trim system and with heat input capacity greater than 5 million Btu and less than 10 million Btu per hour. [40 CFR §§ 63.7495(b), 63.7500(a)(1) and (e), 63.7510(e), 63.7515(d), and Table 3 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	before and after the tune-up of the boiler or process heater; (ii) A description of any corrective actions taken as a part of the tune-up. (iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [40 CFR § 63.7540 (a)(10), (11), (12) and (13), and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	report shall cover the period beginning on January 31, 2016, and ending on December 31, 1016 for an annual compliance report, December 31, 2017 for a biennial compliance report, or December 31, 2020 for a 5-year compliance permit, as applicable. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31. Each subsequent annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. The subsequent annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than January 31. Each compliance report shall contain the following information: (a) Company and Facility name and address. (b) Process unit information, emissions limitations, and operating parameter limitations. (c) Date of report and beginning and ending dates of the reporting period. (d) The total operating time during the reporting period. (e) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to § 63.7540(a)(10), (11), or (12) respectively. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (f) If there are no deviations from the requirements for work practice standards in Table 3 to subpart DDDDD that apply, a statement that there were no deviations from the work practice standards (missed boiler tune-ups) during the reporting period.	

			(g) If there is a deviation from a work practice standard during the reporting period, the report must contain a description of the deviation (which boiler tune-up was missed), duration and cause of the deviation, and the corrective action taken. The permittee shall submit all reports electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee shall submit the report to the U.S. EPA at the appropriate address listed in § 63.13. At the discretion of the US EPA, the permittee shall also submit these reports, to the US EPA in the format specified by the US EPA. [40 CFR § 63.7550 and Table 9 of subpart DDDDD, and s. 285.65(13), Wis. Stats. (MACT, 241063570-P12)]	

ZZZ. Conditions Applicable to the Entire Facility.			
a. LIMITATIONS	**b. COMPLIANCE DEMONSTRATION**	**c. RECORDKEEPING REQUIREMENTS**	**COMPLIANCE STATUS**
SYNTHETIC MINOR CONDITIONS (1) VOC emissions from the Pennsylvania Avenue site (excluding VOC emissions from combustion of natural gas) may not exceed 4,000 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] Note: Permittee elected this condition to avoid non-attainment area major source review under the ozone 1-hr standard, for the construction (1995 construction) of sources at the Pennsylvania Avenue Site. Maximum theoretical VOC emissions from	(1) Within 15 days of end of each calendar month, the permittee shall compute and record the following: (a) Total amount of VOC emitted (in pounds) from processes (other than from combustion of natural gas) located at Pennsylvania Avenue Site; (b) Total amount of VOC emitted (in pounds) from processes (other than from combustion of natural gas) located at Norwich Avenue Site; (c) Total amount of VOC emitted (in pounds) from combustion of natural gas at the facility; (d) Amount of VOC emitted (in pounds per month) from processes (other than from combustion of natural gas)	(1) The permittee shall keep the following monthly records: (a) Total amount of natural gas combusted in processes at the facility (Pennsylvania Avenue Site + Norwich Avenue Site) [s. NR 439.04(1)(d), Wis. Adm. Code {Permit 08-RSG-053}] (2) The permittee shall keep and maintain the records required in condition I.ZZZ.1.b.(1). [s. NR 439.04(1)(d), Wis. Adm.	Compliance –The permittee has records showing the Pennsylvania site does not exceed 4,000 pounds of VOC emissions per month.

combustion of natural gas for sources constructed at the Pennsylvania Avenue site in 1995 are less than 1 tpy. (2) VOC emissions from the Norwich Avenue site (excluding VOC emissions from combustion of natural gas) may not exceed 12,333 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] (3) VOC emissions from combustion of natural gas at the facility may not exceed 250 pounds per month, averaged over any 12 consecutive month period. [s. 285.65(7), Wis. Stats. {Permit 08-RSG-053}] Note: Elected conditions (1), (2) and (3) ensure VOC emissions from the facility are less than 100 tpy. Therefore, the facility will remain a synthetic minor moderate non-attainment area minor source under the ozone 8-hr standard.	located at Pennsylvania Avenue Site, averaged over the last 12 consecutive month period. (e) Amount of VOC emitted (in pounds per month) from processes (other than from combustion of natural gas) located at Norwich Avenue Site, averaged over the last 12 consecutive month period. (f) Amount of VOC emitted (in pounds per month) from combustion of natural gas at the facility, averaged over the last 12 consecutive month period. [s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}] Note: VOC emission sources at the facility include natural gas combustion units (e.g. boiler, reclamation furnace, curing/drying ovens, caustic/water heaters), paint booths, Drum lid clamp dip tank (P65), plastic drum label stripping (P44), Plastic drum cleaning (P45 - when VOC containing solvents are used)	Code {Permit 08-RSG-053}]	

ZZZ.			
a. LIMITATIONS	**b. COMPLIANCE DEMONSTRATION**	**c. RECORDKEEPING AND MONITORING REQUIREMENTS**	**COMPLIANCE STATUS**
State Hazardous Air Pollutants (State HAPs). (1) No owner or operator of a source may cause, allow or permit emissions of a hazardous air contaminant listed in Table A of s. NR 445.07, Wis. Adm. Code, in such quantity or concentration or for such duration as to cause an ambient air concentration of the contaminant off the source property that exceeds the concentration in column (g) of Table A for the contaminant. [s. NR 445.07(1)(a), Wis. Adm. Code {Permit 08-RSG-053}]* (2) Methylene chloride (indoor fugitive) emissions from process P44:	(1) The permittee shall only burn Group 1 virgin fossil fuels (Natural gas, propane, distillate #2 and diesel fuel oil) when firing any fuel combustion sources. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (2) When the permittee elects to significantly change the existing operation (e.g., raw material or product change or production capacity increase), the permittee shall determine, either analytically or through the use of technical calculations, the facility's new or increased potential emissions of any state hazardous air pollutant (State HAP) emitted, assuming maximum operation conditions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (3) The permittee shall determine if the facility's new or increased potential emission rate of any State HAP exceeds the applicable published de minimus value in Table A of s. NR 445.07, Wis. Adm. Code. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (4) When the facility's new or increased potential emission rate of any State HAP exceeds a published de minimus value, the permittee shall evaluate the impact of the pollutant's emission	) (1) Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the U.S. EPA or the Department. [ss. NR 407.09(1)(c)1.a. & 4(a)1. and NR 439.06(8), Wis. Adm. Code] (2) The permittee shall keep records of any test results (including sampling protocol), and any other information used to demonstrate compliance with condition I.ZZZ.2.a.(2). [s. NR 439.04(1)(d), Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	No Evidence of Noncompliance

In order to demonstrate that methylene chloride (indoor fugitive) emissions are exempt from NR 445 review, permittee shall demonstrate to the Department that the source is in compliance with applicable occupational safety and health administration requirements. [s. NR 445.07(5)(d)2., Wis. Adm. Code, s. 285.65(3), Wis. Stats. {Permit 08-RSG-053}]	and determine if any additional action needs to be taken to protect the ambient air quality standard. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* (5) See conditions in sections I.E.1, I.I.3, and I.L.3 for applicable requirements for NaOH emissions.		

FACILITY REPORTING REQUIREMENTS:

Requirement	Frequency and/or Due Date	Compliance Status
Annual Compliance Certification (Operation Permit)	Due annually March 1	COMPLIANCE
Annual Air Emission Inventory	Due annually March 1	COMPLIANCE
Semi-annual Compliance Monitoring Reports (Operation Permit)	March 1 and September 1	COMPLIANCE
Semi-annual Deviation Report (NESHAP)	March 1 and September 1	COMPLIANCE

RESULTS OF PREVIOUS FCE REPORTS/SITE VISITS:

FCE Report Date	Result	Comments
April 23, 2013	Compliance	A. Singh
February 14, 2011	Compliance	A. Singh
September 22, 2008	Noncompliance	Failure to perform inline averaging.

RESULTS OF PREVIOUS EMISSION TESTS:

Source	Test Date	Pollutant(s)	Emission Limit	Result	Comments
There have been no compliance demonstration tests performed at this facility.					

SUMMARY OF PREVIOUS COMPLAINTS:

Complaint Date	Complaint Description	Follow-Up Action	Comments
No complaint in the file since last inspection.			

SUMMARY OF PREVIOUS ENFORCEMENT ACTIONS:

Action Date	Action Type	NR Code Cited	Resolved	Comments
3/29/2010	Referral	NR 406.03 Wisc,. Adm. Code, NR 423.035(3) Wisc. Adm. Code, 285.60(7) State Stats., Construction permit, record keeping and notification requirements.	Yes 4/4/2010	Case settled with $220,000 stipulated penalty.
12/07/2007	NOV	(See above)	no	Case was referred to DOJ.

INSPECTION FIELD NOTES AND DISCUSSION

The purpose of this inspection was to determine the facility's compliance status with respect to Wisconsin's air pollution control regulations and the facility's Title V Air Permit. This inspection was coordinated with Mr. Mark Furgason – Mid-America Steel Drum Co./Kitzinger. Also present during this inspection was Amy J. Litscher – President, Saga Environmental & Engineering, Inc. (Scott Swosinski, V.P and General Manager of Mid-America Steel Drum was notified of this inspection and at his request, the inspection was coordinated through Mark Furgason.) During the inspection, the weather conditions were partly cloudy with winds from the west at 5 miles per hour. The temperature was 40 °F. I surveyed the areas upwind and downwind of the facility with no distinguishable odors being detected. The inspection started at 9:00 AM and was completed at 1:30 PM.

I met Mark Furgason at the Norwich Avenue site. Mark explained how the company had decided to consolidate its operations and shut down the Norwich Avenue site. The Pennsylvania site will become the plastic drum reclamation facility and the facility in Oak Creek will refurbish steel drums. Mark escorted me through the Norwich building and explained how many of the processes had been removed, relocated, sold or scrapped. Many of the manufacturing areas were vacant. Some of the barrel conveyors were still present along with the thermal reclamation incinerator which is located outside in the rear of the building. The doors had been removed and

placed near the rear service door. I noted the doors to be insulated and commented to Mark that equipment to be dismantled should be inspected and tested for asbestos prior to disturbing. Mark believed the firebrick to be asbestos free as much of this material was routinely replaced over the years due to thermal decomposition and wear. The east end of the building was occupied by a new tenant who is in the scrap business. I observed a cart load of four foot fluorescent light fixtures (no bulbs), being placed in a press and compressed. In an adjoining room there were what appeared to be hospital type operating room type lamps and assorted sheet goods. Towards the south end of the center of the building is a storage area where Mid-America is storing new metal 55 gallon drums. These were palletized and stacked up from floor to the ceiling. Mark stated that they are still in the process of relocating all of the remaining equipment out of this building. What remains is residual equipment with no immediate plans or destination. The boiler that was used for process heating appeared to have been abandoned in place.

We proceeded to the Pennsylvania Avenue site for a review of the facility records and to inspect this second site. At the Pennsylvania site I met with Amy J. Litscher – President, Saga Environmental & Engineering, Inc. Amy provided copies of the facility records and coating compliance data. Records for both the Norwich Avenue site and the Pennsylvania sites were reviewed. Since the operations of the Norwich site were shut down in November of 2013, many of these records had been relocated in shipping boxes. Mark had made these available for review. I limited my review to the records for 2013 to date. All records were complete and in good order. All records showed compliance or no evidence of noncompliance.

I surveyed the Pennsylvania facility. There is major construction/reconstruction of the new automated drum processing system going on in this building. Much of the drum processing will occur on the second level of the structure with automation being the focus of this process. Washing stations, rinsing, inspection, tightness testing, exterior cleaning and removing of labeling, shot blast and painting are the stations being installed. In the west end of the assembly is a large stainless steel scrubber. Pumps and various controls are located on the floor level. The electricians were in process of installing the wiring while we were surveying their progress. Once complete, the Pennsylvania facility will sever its “air permit connection” with the Norwich site. Each facility will become a non-Title V source and will be removed from the CMS inspection schedule.

On August 11, 2014, construction permit 14-RSG-142 was issued to Container Life Cycle Management (CLCM) for the Pennsylvania site. The FID number is 341158070.

RECOMMENDATIONS/CONCLUSIONS

The facility is operating in compliance with their operation permit. Based on the recent construction permitting activity, this is now a non-Title V source and therefore it should be removed from the CMS inspection commitment listing (FID 241063570).

SAFETY EQUIPMENT REQUIRED:

☒ HEARING PROTECTION
☒ HARD HAT
☒ SAFETY GLASSES
☒ SAFETY SHOES
☐ OTHER